

# EXHIBIT U

**Minga, Jay**

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**From:** Julian, Robert <rjulian@bakerlaw.com>  
**Sent:** Saturday, May 25, 2019 6:39 PM  
**To:** Slack, Richard  
**Cc:** Jones, Hannah L.; Liou, Jessica; lgrossbard@cravath.com; Singh, David; David Herman; Peter Benvenuti; Karotkin, Stephen; Monica Kozycz; Kristiansen, Eric; Jane Kim (jkim@kellerbenvenuti.com); Kramer, Kevin  
**Subject:** Re: Order After May 8 Discovery Hearing

Richard,  
That agreement and order are acceptable.  
Thanks,

Robert Julian  
Partner

Baker Hostetler  
1160 Battery St.  
Suite 100  
San Francisco, CA  
Tel: 415 806 6000

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[bakerlaw.com](http://bakerlaw.com)

On May 24, 2019, at 3:35 PM, Slack, Richard <[richard.slack@weil.com](mailto:richard.slack@weil.com)> wrote:

Bob,

The Court did not address the time for production at the hearing and did not instruct the parties to include a production timeline in the Order. We therefore do not believe that the Order should have any such date because it is intended to reflect the actual rulings of the Court at the hearing.

Nevertheless, the Debtors are prepared to work with you on reasonable production dates. We propose that we will make our first rolling production responsive to both the 2004 Application and the management-related requests 15 days from the date of entry of the Order. The Debtors will then produce additional responsive documents to such requests on a rolling basis, and make a reasonable, good faith effort to complete production within 30 days of the date of its first production. The time is reasonable and necessary given the volume of the requests, including, for example, that the requested board materials span 3 years, are highly sensitive and will need to be carefully reviewed for privilege, and the contractor information spans 10 years and many miles of wires.

Please let us know if the TCC is signed off on the Order so we can submit to the Court or if there is anything further to discuss regarding production timeline issues.

Thanks,

Richard

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**From:** Julian, Robert <[rjulian@bakerlaw.com](mailto:rjulian@bakerlaw.com)>  
**Sent:** Thursday, May 23, 2019 4:33 PM  
**To:** Jones, Hannah L. <[Hannah.L.Jones@weil.com](mailto:Hannah.L.Jones@weil.com)>  
**Cc:** Liou, Jessica <[jessica.liou@weil.com](mailto:jessica.liou@weil.com)>; [lgrossbard@cravath.com](mailto:lgrossbard@cravath.com); Singh, David <[David.Singh@weil.com](mailto:David.Singh@weil.com)>; David Herman <[DHerman@cravath.com](mailto:DHerman@cravath.com)>; Peter Benvenutti <[pbenvenutti@kellerbenvenutti.com](mailto:pbenvenutti@kellerbenvenutti.com)>; Slack, Richard <[richard.slack@weil.com](mailto:richard.slack@weil.com)>; Karotkin, Stephen <[stephen.karotkin@weil.com](mailto:stephen.karotkin@weil.com)>; Monica Kozycz <[mkozycz@cravath.com](mailto:mkozycz@cravath.com)>; Kristiansen, Eric <[EKristiansen@bakerlaw.com](mailto:EKristiansen@bakerlaw.com)>  
**Subject:** RE: Order After May 8 Discovery Hearing

Hannah,  
The Order is fine, however we need a production date in the order. My order said 15 days from the date of the order. We suggest that date. My email on this did not go out last week, sorry. So would you please advise us tomorrow?  
Thanks,  
Bob

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**From:** Jones, Hannah L. <[Hannah.L.Jones@weil.com](mailto:Hannah.L.Jones@weil.com)>  
**Sent:** Thursday, May 16, 2019 4:01 PM  
**To:** Julian, Robert <[rjulian@bakerlaw.com](mailto:rjulian@bakerlaw.com)>; Kristiansen, Eric <[EKristiansen@bakerlaw.com](mailto:EKristiansen@bakerlaw.com)>; Woltering, Catherine E. <[cwoltering@bakerlaw.com](mailto:cwoltering@bakerlaw.com)>  
**Cc:** Liou, Jessica <[jessica.liou@weil.com](mailto:jessica.liou@weil.com)>; [lgrossbard@cravath.com](mailto:lgrossbard@cravath.com); Singh, David <[David.Singh@weil.com](mailto:David.Singh@weil.com)>; David Herman <[DHerman@cravath.com](mailto:DHerman@cravath.com)>; Peter Benvenutti <[pbenvenutti@kellerbenvenutti.com](mailto:pbenvenutti@kellerbenvenutti.com)>; Slack, Richard <[richard.slack@weil.com](mailto:richard.slack@weil.com)>; Karotkin, Stephen <[stephen.karotkin@weil.com](mailto:stephen.karotkin@weil.com)>; Monica Kozycz <[mkozycz@cravath.com](mailto:mkozycz@cravath.com)>  
**Subject:** Order After May 8 Discovery Hearing

All,

Please find attached the draft proposed order in connection with the May 8 discovery conference. Please let us know if the TCC has edits or is signed off.

Best,  
Hannah

<image001.jpg>

**Hannah L. Jones**  
Associate

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